

SUSSEX COUNTY COUNCIL
POST OFFICE BOX 589
GEORGETOWN, DELAWARE 19947

INDUSTRIAL WASTEWATER CONTRIBUTION PERMIT

In accordance with the provisions of the "Code of Sussex County,"
Chapter 110, Part 1, Sewer Use,

Procino Plating, Inc.
901 South Market Street
Blades, DE 19973

is granted permission to discharge wastewater to the Blades
Sanitary Sewer District at the location designated as:

Procino Plating, Inc.
901 South Market Street
Blades, DE 19973
Tax Map No. 1-32-1.15 (187&188)


subject to the permit conditions established.

Effective Date: June 1, 2009

Expiration Date: June 1, 2013

*Changes may be necessary before the expiration date due to
changes in Federal, State, County or City of Seaford
regulations or the agreement between the County Council
and the City of Seaford.

Signed:


Michael A. Izzo, P.E.
Sussex County Engineer
Sussex County, Delaware

Renewal of Permit No. BL-03-001

PERMIT CONDITIONS

General

1. The named permit holder shall be expressly subject to all provisions of the "Code of Sussex County, Chapter 110, Part 1", all other regulations established by the Sussex County Council, The City of Seaford's Industrial Pretreatment Ordinance, Chapter 11 Article 6, governing wastewater, and the Interjurisdictional Agreement for Industrial Pretreatment for the City of Seaford and Sussex County.
2. The permit holder will be responsible for all user charges and fees, as outlined in the "Code of Sussex County," Chapter 110, and any other fees or charges as established by the Sussex County Council or the City of Seaford.
3. This wastewater discharge permit is issued in the name of the permit holder and shall not be reassigned or transferred or sold to a new owner, new user, different premises, or a new or changed operation without the prior approval of the Sussex County Council or the City of Seaford.
4. The permit holder shall report to the Sussex County Engineer any changes (permanent or temporary) to the premises or operations that are described in the wastewater discharge permit application submitted by the permit holder, or deviate from the terms and conditions under which this permit is granted. The permit holder must notify the Sussex County Engineer of any significant changes to the User's operations or system, which might alter the nature, quality, or volume of its wastewater at least ninety (90) days before the change.
 - 1) The Sussex County Engineer may require the User to submit such information as may be deemed necessary to evaluate the changed condition, including the submission of a wastewater discharge permit application under Section 11-46(e) of the City of Seaford's Industrial Pretreatment ordinance.
 - 2) The Sussex County Engineer may issue a wastewater discharge permit under Section 11-46(b) of the City of Seaford's Industrial Pretreatment ordinance or modify an existing wastewater discharge permit Section 11-47(d) of the City of Seaford's Industrial Pretreatment ordinance in response to changed conditions or anticipated changed conditions.
5. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Clean Water Act and Title 7, Section 6033, Delaware Code Annotated and is grounds for enforcement action; for permit termination and revocation and reissuance or modification; or denial of a permit renewal application.

6. The permittee must comply with the monitoring and reporting requirements of the general pretreatment regulations, 40 CFR, Part 403.
7. The permit holder may submit semi-annual certification statements of no dumping of solvents in lieu of Total Toxic Organics (TTO) monitoring. Each semi-annual report must be signed by a responsible corporate officer of the company or manager responsible for the overall plant operation and submitted in accordance with 40 CFR 403.12(e).
8. The permittee shall develop, submit for approval and implement an accidental discharge/slug control plan. The accidental discharge/slug control plan shall address, at a minimum, the following: (1) description of discharge practices including non-routine batch discharges; (2) description of stored chemicals; (3) procedures for immediately notifying the permitting authority of any accidental or slug discharge; and (4) procedures to prevent adverse impact from any accidental or slug discharge. Such procedures include, but are not limited to, inspection and maintenance of storage areas, handling and transfer of materials, loading and unloading operations, control of plant site run-off, worker training, building of containment structures or equipment, measures for containing toxic organic pollutants, including solvents, and/or measures and equipment for emergency response. (5) maintain a list of emergency contact numbers.
9. The Sussex County Engineer reserves the right to revise this permit based on changes in Sussex County's or the City of Seaford's local pretreatment limits or the potential of the permittee's discharge to harm Sussex County's facilities or the City of Seaford's wastewater treatment process.
10. The permittee shall allow the County Engineer, or an authorized representative, upon the presentation of credentials and other documents as required by law to:
 - a. Enter the permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;
 - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c. Inspect at reasonable time any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit;
 - d. Sample or monitor, for the assuring of permit compliance, any substances or parameters at any location; and
 - e. Inspect any production, manufacturing, fabricating, or storage area where pollutants, regulated under the permit, could originate, be stored or be discharged to the sewer

system.

11. Hazardous waste, as identified in 40 CFR Part 261, is strictly prohibited from being discharged to the sewer system.
12. Signatory Requirement: The monthly reports required in the permit, along with any other sampling and analysis data collected by the User, are required to be submitted with the Signatory or Certification Statement outlined under 40 CFR 403.6 of the General Pretreatment Code, which is included below, and signed by a principal executive officer of the corporation.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or the persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines or imprisonment for knowing violations."

13. This permit is issued for the discharge of waste from a chemical etching of aluminum process consisting of Potassium Hydroxide and Nitric Acid only, as stated in the permittee's application. Discharges other than from the above stated process will be a violation of this discharge permit.
14. There is to be NO electroplating performed at this location that requires waste to be discharged into the sanitary sewer. This permit does not allow electroplating discharges even though both electroplating and chemical etching both fall under the 40 CFR, Part 433, metal finishing.
15. This permit does not allow any discharges of stored waste or by-products of the electroplating process. The permittee must notify the EPA that they no longer are electroplating which requires a discharge and all of the stored waste must be hauled off site to be disposed of within ninety (90) days in accordance with the EPA.

Effluent Limitations

1. Effluent limitations shall be in accordance with the requirements of the "Code of Sussex County," "City of Seaford Pretreatment Local Limits" or the U. S.

Environmental Protection Agency (EPA) Effluent Guidelines for the Metal Finishing Industry, as published in 40 CFR, Part 433.

2. The permittee is authorized to discharge, for the duration of this permit, wastewater to the Blades Sanitary Sewer District from the outfalls listed below.

Description of outfalls/sample points:

<u>Outfall</u>	<u>Descriptions</u>
001	Discharge Process Wastewater, sample pit outside of bld. 2, concrete vault on north side of bld.
002	Domestic sanitary sewer discharge, locked manhole outside of bld. 1, north side of bld., near front of bld.

3. For the duration of this permit, the discharge from outfall 001 shall not exceed the following effluent limitations. Effluent from this outfall shall only consist of treated process wastewater.

<u>Pollutant or Pollutant Property</u>	<u>Max. For Any Day (mg/l)</u>	<u>Monthly Average Shall Not Exceed (mg/l)</u>
Flow	20,000 gpd	
Cadmium (T)	0.11	0.05
Chromium (T)	2.77	1.71
Copper (T)	3.38	1.40
Lead (T)	0.69	0.43
Nickel (T)	3.98	0.73
Cyanide (T)	1.20	0.32
Zinc (T)	2.61	1.48
Silver (T)	0.43	0.24
TTO	2.13	2.13
Mercury*		.10
Arsenic*		1.00
Selenium*		0.05
BOD*		350
pH	must be maintained between 6.0 and 9.0 units	

Source: 40 CFR, Section 433.17, "Code of Sussex County"
 *City of Seaford's Local Limits, per
 Interjurisdictional Agreement.

4. For the duration of this permit, the discharge from outfall 002 shall be of domestic or non process wastewater only.
5. The permittee shall not discharge wastewater containing any of the listed specific prohibitions.
6. All discharges shall comply with all provisions of the "Code of Sussex County, Chapter 110, Part 1", all other regulations established by the Sussex County Council, The City of Seaford's Industrial Pretreatment Ordinance, Chapter 11 Article 6, governing wastewater, enforced by the Interjurisdictional Agreement for Industrial Pretreatment for the City of Seaford and Sussex County, and any applicable State and Federal pretreatment laws, regulations, standards, and requirements including any such laws, regulations, standards, and requirements that may become effective during the term of this permit.

Monitoring Requirements

1. For the duration of this permit, the permittee shall monitor outfall 001 for the following parameters, at the indicated frequency:

<u>Sample Parameter (units)</u>	<u>Measurement Location</u>	<u>Frequency</u>	<u>Sample Type</u>
Flow ¹ (gpd)	001	Continuous	Totalize/Record
pH ¹ (s.u.)	001	Daily	Grab
Cadmium ¹ , Chromium ¹ , Copper ¹ , Lead ¹ , Nickel ¹ Silver ¹ , & Zinc ¹	001	1/6 Months ³	Composite ²
Cyanide ¹	001	1/6 Months ³	Grab
BOD ₅ ¹	001	1/6 Months ³	Composite ²
Arsenic ¹	001	1/6 Months ³	Composite ²
Mercury ¹	001	1/6 Months ³	Composite ²
Selenium ¹	001	1/6 Months ³	Composite ²

(This does not preclude the SCED taking unannounced samples in addition to those taken by the permittee.)

Notes:

- (1) Sampling shall be taken on a day when the etching process is running and discharging to the sanitary sewer.
 - (2) Composite samples shall be obtained by combining equal volumes from multiple grab samples obtained during the aluminum etching process. The first sample shall be taken between 30 and 60 minutes of commencing the etching line. Successive samples shall be taken at equal intervals, not to exceed 60 minutes, for the duration of the process. The composite sample shall be comprised of a minimum of four (4) grab samples. For each sample taken, the permittee shall record the date, time, volume of grab used in composite sample, and the individuals performing the sampling.
 - (3) The frequency of sampling shall be at least once every six months for a minimum total of two times per calendar year.
2. All analyses shall be performed in accordance with EPA approved analyses methods (40 CFR, Part 136) by an independent testing firm, excluding pH, which is done by the permittee.
 3. A meter to measure the wastewater discharge shall be maintained. The permittee shall provide certification that this meter has been calibrated and is in good working order, annually by a qualified technician. Flow shall be monitored daily using a meter and chart recorder. The recorder shall use 7-day charts of 8-inch diameter. The meter shall have 4 to 20 mA output, capable of connecting to ISCO 2900 model composite sampler. The meter has been installed at the following location(s): (provide location)
 4. The permit holder is required to maintain an inspection and sampling manhole at the following locations(s):

Sampling point in waste line, immediately outside the structure, housing the production area that includes the total wastewater flow from the production facilities. The sampling manhole must be capable of housing ISCO Model 2900 Composite Sampler.
 5. Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored discharge. All samples shall be taken at the monitoring point in this permit and, unless otherwise specified, before the effluent joins or is diluted by any other waste stream, body

of water, or substance. All equipment used for sampling and analyses must be calibrated daily, inspected, and maintained to ensure their accuracy. Monitoring points shall not be changed without notification to and approval of the Sussex County Engineer.

Reporting Requirements

1. Periodic Discharge reports

A discharge report containing the results of the monitoring program shall be filed with the County Engineer by the second Tuesday of each month. Additional information to be included in each report is as follows:

Quarterly water consumption in gallons
Flow charts
pH calibration log
Process log
Sampling log (as needed)
Chain of custody (as needed)
Sample analysis (as needed)

2. Permit Noncompliance

- a. If a sampling performed by a permit holder indicates a violation, the user must notify the Sussex County Engineer within twenty-four (24) hours of becoming aware of the violation.
- b. Submit in writing, within 10 days, a description of noncompliance, cause if known, procedures taken for compliance, and procedures taken to prevent reoccurrence, to include changes in policy, procedures, and production.
- c. The permit holder shall also repeat the sampling and analysis and submit the results of the repeat analysis to the Sussex County Engineer within thirty (30) days after becoming aware of the violation.

3. The permit holder shall retain all records of information obtained pursuant to any monitoring activities, including calibration and maintenance records and all original circular chart recordings for continuous monitoring instrumentation, required by this permit. Records shall include the date, exact place, method, and time of sampling, and the name of the person(s) taking the samples; the dates analyses were performed; who performed the analyses; the analytical

techniques or method used; and the results of such analyses. The records shall remain available for a period of at least three (3) years.

4. Accidental Discharge Report

- a. The permittee shall notify the Superintendent of the POTW immediately upon the occurrence of an accidental discharge of substances prohibited by Section 11-43 of the City of Seaford Industrial Pretreatment Ordinance, Chapter 11 Article 6, or any slug loads or spills that may enter the public sewer. During normal business hours the Superintendent should be notified by telephone at (302) 629-8340. At all other times the Superintendent should be notified by telephone at either (302) 448-9535, or (302) 236-3973, after 5 P.M. Monday - Friday, weekends and holidays. The notification should include location of discharge, date and time thereof, type of waste, including concentration and volume, and corrective actions taken. The permittee's notification of accidental releases in accordance with this section does not relieve it of other reporting requirements that arise under Local, State, or Federal laws.
- b. Within five days following an accidental discharge, the permittee shall submit to the County Engineer a detailed written report. The report shall specify;
 - 1) Description and cause of the upset, slug load or accidental discharge, the cause thereof, and the impact on the permittee's compliance status. The description should include location of discharge, type, concentration, and volume of waste.
 - 2) Duration of noncompliance, including exact dates and times of noncompliance and if the noncompliance is continuing, the time by which compliance is expected to occur.
 - 3) All steps taken or to be taken to reduce, eliminate, and/or prevent recurrence of such an upset, slug load, accidental discharge, or other conditions of noncompliance.

- c. The permittee is required to notify the County Engineer immediately of any changed conditions at its facility affecting the potential for a slug discharge.

Standard Conditions

1. A user with an expiring wastewater discharge permit shall apply for wastewater discharge permit reissuance by submitting a complete permit application, a minimum of ninety (90) days prior to the expiration of the user's existing wastewater discharge permit.

An expired permit will continue to be effective and enforceable until the permit is reissued if:

- a. The permittee has submitted a complete permit application at least (90) days prior to the expiration date of the user's existing permit.
 - b. The failure to reissue the permit, prior to the expiration of the previous permit, is not due to any act on the part of the permittee.
2. When the Sussex County Engineer finds that a user has violated, or continues to violate, any provision of this permit, a wastewater discharge ordinance, or order issued hereunder, or any other pretreatment standard or requirement, the Sussex County Engineer may petition the Court of Chancery of the State of Delaware through the County's Attorney for the issuance of a temporary or permanent injunction, as appropriate, which restrains or compels the specific performance of the wastewater discharge permit, order or other requirement imposed by this permit on activities of the user. The Sussex County Engineer may also seek such other action as is appropriate for legal and/or equitable relief, including a requirement for the user to conduct environmental remediation. A petition for injunctive relief shall not be a bar against, or a prerequisite for, taking any other action against a user.

A user who has violated, or continues to violate, any provision of this permit, a wastewater discharge permit, or order issued hereunder, or any other pretreatment standard or requirement shall be liable for maximum civil penalties of \$1,000 per violation, per day. In the case of a monthly or other long-term average discharge limit, penalties shall accrue for each day during the period of the violation. The Sussex County Engineer may recover reasonable attorney's fees,

court costs, and other expenses associated with enforcement activities, including sampling and monitoring expenses, and the cost of any actual damages incurred by the County and/or City. In determining the amount of civil liability, the court shall take into account all relevant circumstances, including, but not limited to, the extent of harm caused by the violation, the magnitude and duration of the violation, any economic benefit gained through the user's violation, corrective actions by the user, the compliance history of the user, and any other factor as justice requires. Filing a suit for civil penalties shall not be a bar against, or a prerequisite for, taking any other action against a user.

A user who willfully or negligently violates any provisions of this permit, a wastewater discharge permit, or order issued hereunder, or any other pretreatment standard or requirement shall, upon conviction, be guilty of a misdemeanor, punishable by a fine of not more than five thousand dollars (\$5,000) per violation, per day, or imprisonment for not more than (1) year or both.

A user who willfully or negligently introduces any substance into the POTW which causes personal injury or property damage shall, upon conviction, be guilty of a misdemeanor and be subject to a penalty of at least five thousand dollars (\$5,000) or be subject to imprisonment for not more than one (1) year, or both. This penalty shall be in addition to any other cause of action for personal injury or property damage available under State law.

A user who knowingly makes any false statements, representations, or certifications in any application, record, report, plan or other documentation filed, or required to be maintained, pursuant to this ordinance, wastewater discharge permit, or order issued hereunder, or who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required under this permit shall, upon conviction, be punished by a fine of not more than five thousand dollars (\$5,000) per violation, per day, or imprisonment for not more than one (1) year, or both.

The remedies provided for in this permit are not exclusive. The Sussex County Engineer may take any, all or any combination of these actions against a noncompliant user. Enforcement of pretreatment violations will generally be in accordance with the City's enforcement response plan as established in the Industrial Pretreatment Ordinance, Chapter 11 Article 6. However, the Sussex County Engineer may take other action against any user when the circumstances warrant. Further, the Sussex County Engineer is empowered to make more

than one enforcement action against any noncompliant user.

Special Conditions

1. The permittee shall never increase the use of process water or in any way attempt to dilute a discharge as a partial or complete substitute for adequate treatment to achieve compliance with the limitations contained in the "Federal Categorical Pretreatment Standards" or in any other pollutant-specific limitation developed by the County or State.

Sewer User Charges

In accordance with the "Code of Sussex County," Chapter 110, the permit holder shall be charged for sewer use, as follows:

1. Service charge to be billed quarterly. It will be based on the amount of wastewater flow requested by the permittee and agree to by the County. All changes must be requested in writing. Flow will be measured in EDUs (Equivalent Dwelling Units), which equal 300 gallon per day of flow.
2. Front Foot Assessment Charge to be billed annually. It will be based on Section 110-92, "Code of Sussex County."

Process Log Summary - Procino Plating

Month _____, Year _____

[illegible]

Trial	Control	MCI	AD
1	85	75	65
2	88	78	68
3	90	80	70
4	92	82	72
5	95	85	75

Concentration of inhibitor (mole/l)	Rate of polymerization (mole/l·hr)
0.0	1.0
0.1	0.8
0.2	0.65
0.3	0.55
0.4	0.48
0.5	0.42
0.6	0.38
0.8	0.32
1.0	0.28

$\frac{1}{2}$

Metals and Cyanide - Procino Plating

Chain of Custody / Sampling Log

Metals

Sample Type: _____ Sample ID: _____

Preservative _____

Grab#	Date	Time	Vol. (ml)	Initial
1				
2				
3				
4				
5				
6				
7				
8				
Total Vol. collected				

Cyanide

Sample Type: _____ Sample ID: _____

Preservative _____

Grab#	Date	Time	Vol. (ml)	Initial
1				
2				
3				
4				
Total Vol. collected				

Relinquished By: _____ Date/Time: _____ Condition: _____

Received By: _____ Date/Time: _____ Condition: _____

Relinquished By: _____ Date/Time: _____ Condition: _____

Received By: _____ Date/Time: _____ Condition: _____

**PROCINO PLATING, INC.
901 S. MARKET STREET
BLADES, DE 19973
(302) 629-0331
(302) 629-8787 (FAX)**

**ACCIDENTAL DISCHARGE / SLUG
CONTROL PLAN**

Rev. 04/09

This Accidental Discharge/Slug Control plan addresses the requirements of 40 CFR403.8(f)(2)(v), as is required by Procino Plating, Inc.'s Permit No. BL-03-001.

Procino Plating, Inc. fully supports the national and local effort to protect the environment. Because some of our jobs deal with the handling, storage and disposal of materials that, if mishandled, would be harmful to the environment, we must be dedicated to the principal of knowing what is to be done, when to do it, and how to do it safely.

As a company, we will not tolerate the improper disposal of any liquid or material that is hazardous to the health of individuals or damaging to the environment. Any employee found to be improperly disposing of hazardous waste will not only be subject to disciplinary action, but will also be reported to local and/or federal environmental protection agencies.

The exhibits that follow include but are not limited to:

1. Accidental discharge report.
 2. Flow pattern for the plating room area showing discharge practices.
 3. Description of chemicals on hand.
 4. A Hazardous Waste Emergency List posted at each telephone.
-
5. New hire training in Spill/Slug Response Procedures and Written Hazard Communications.

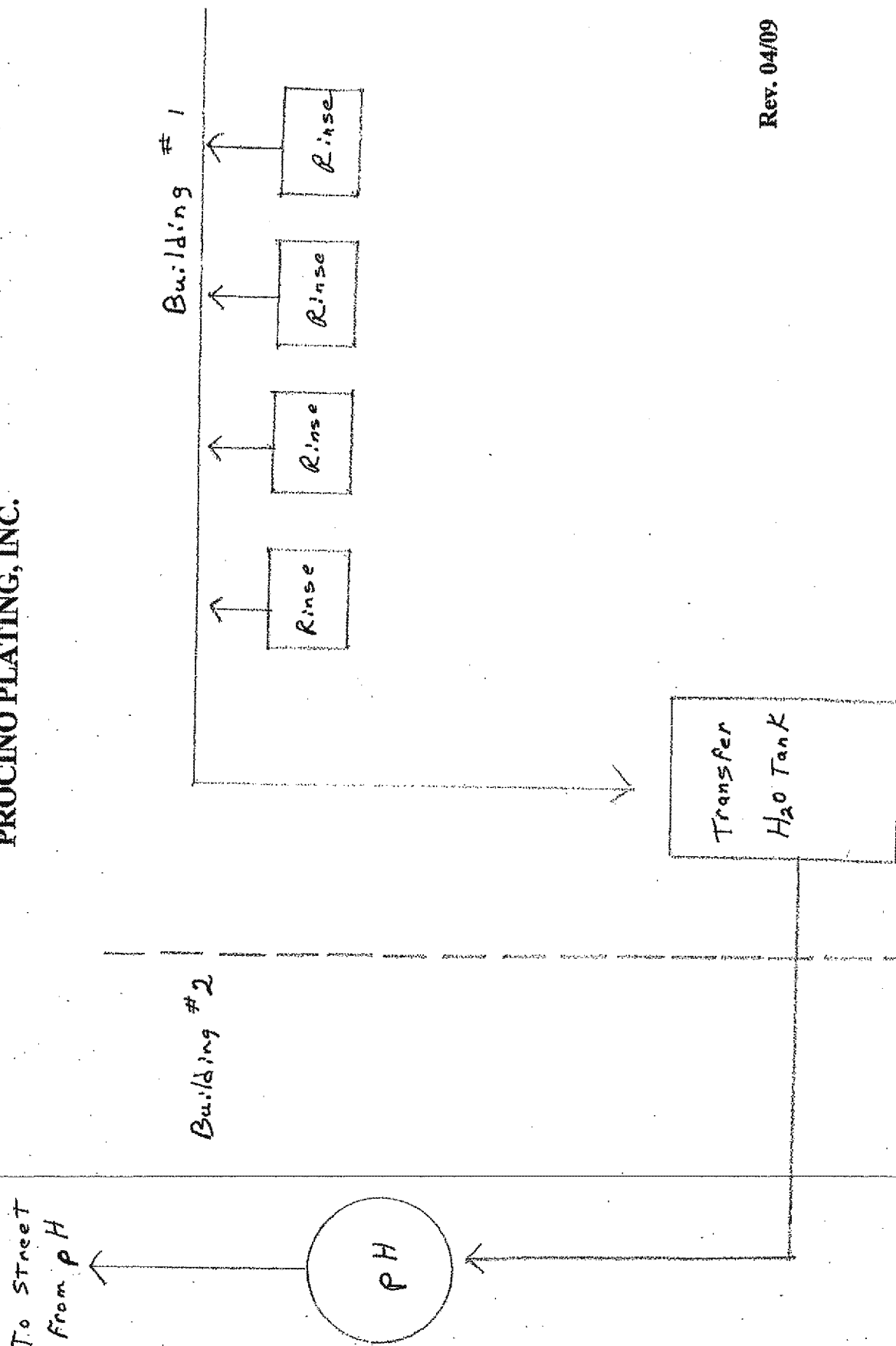
Accidental Discharge Report:

- a. Procino Plating shall notify the Sussex County Engineer and the Superintendent of the City of Seaford's POTW immediately upon the occurrence of an accidental discharge of substances prohibited by Section 11-43 of the City of Seaford Industrial Pretreatment Ordinance, Chapter 11 Article 6, or any slug loads or spills that may enter the public sewer. During normal business hours the Sussex County Engineer should be notified at (302) 855-7718, the POTW Superintendent should be notified by telephone at (302) 629-8340. At all other times the Sussex County Call Board should be notified at (302) 855-7803, the POTW Superintendent should be notified by telephone at either (302) 448-9535, or (302) 236-3973, after 5 P.M. Monday – Friday, weekends and holidays. The notification should include location of discharge, date and time thereof, type of waste, including concentration and volume, and corrective actions taken. Procino Plating's notification of accidental releases in accordance with this section does not relieve it of other reporting requirements that arise under Local, State, or Federal laws.
- b. Within five days following an accidental discharge, Procino Plating shall submit to the County Engineer a detailed written report. The report shall specify:
 - 1) Description and cause of the upset, slug load or accident discharge, the cause thereof, and the impact on Procino Plating's compliance status. The description should include location of discharge, type, concentration, and volume of waste.
 - 2) Duration of noncompliance, including exact dates and times of noncompliance and if the noncompliance is continuing, the time by which compliance is expected to occur.

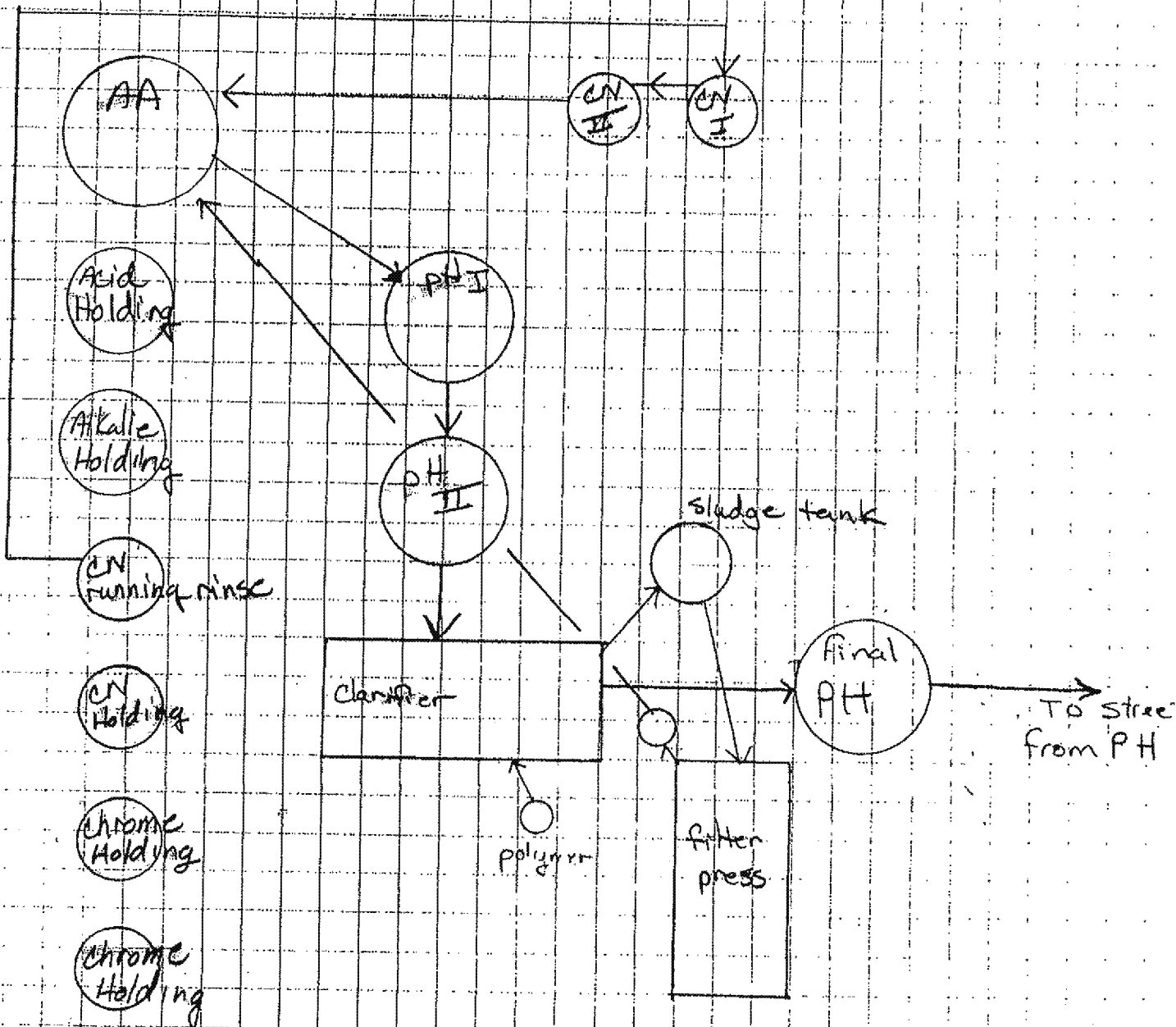
3) All steps taken or to be taken to reduce, eliminate, and/or prevent recurrence of such an upset, slug load, accidental discharge, or other conditions of noncompliance.

c. Procino Plating will notify the County Engineer immediately of any changed conditions at its facility affecting the potential for a slug discharge.

NORMAL OPERATION FLOW
PROCINO PLATING, INC.



Rev. 04/09



Not in use
04/09

PROCINO PLATING, INC.

FLOW DIAGRAM
PRE-TREATMENT SYSTEM

PROCINO PLATING, INC.
STORED CHEMICALS

ACIDS:

Nitric Acid	Outside Tank 400 gal
Chromic Acid Flake	Powder 100 drum
Hydrochloric Acid	Liquid 55 drum

CAUSTICS:

Potassium Hydroxide	Powder bag
Sodium Hypochlorite	Liquid 55 drum
Sodium Metabisulfite	Powder 40 lb bag

Rev: 04/09

HAZARDOUS WASTE

EMERGENCY LIST

POSTED AT

ALL TELEPHONES

HAZARDOUS WASTE EMERGENCY LIST

POLICE: BLADES 911 OR 629-7329
FIRE: BLADES 911 OR 629-4896
AMBULANCE: BLADES 911 OR 629-4896

DELAWARE DNREC: 800-662-8802
NATIONAL RESPONSE CENTER: 800-424-9992
SUSSEX COUNTY ENGINEER: 302-855-7718
AFTER HOURS 302-855-7803
SEAFORD POTW SUPERINTENDENT 302-629-8340
AFTER HOURS 302-448-9535

COMPANY NAME: PROCINO PLATING, INC.
901 S. MARKET STREET
BLADES, DE 19973

LOCATION: FROM RT#13, TURN WEST ONTO RT#20 WEST,
LEFT AT STOP SIGN, (8) BLOCKS ON RIGHT, CORNER OF
MARKET & 9TH STREETS.

MAJOR WASTE TYPES: ACIDS & CAUSTICS

EMERGENCY COORDINATORS & NUMBERS:

PRINCIPLE: PAT PROCINO 875-7395 / 542-9723
ALTERNATE: DOUG ANDREW 875-4098 / 542-9721
ALTERNATE: NATE HEDGES 629-3936 / 448-1229

LOCATION OF FIRE EXTINGUISHERS:
AT DOOR EXITS

SPILL CONTROL MATERIAL:

SPEEDY DRY & SHOP VAC LOCATED AT PLATING ROOMS

FIRE ALARM:

CODE RED ANNOUNCED OVER THE INTERCOM SYSTEM

FIRST AID STATION: IN TIME CLOCK AREA

PROCINO PLATING, INC.
901 S. MARKET STREET
BLADES, DE 19973
(302) 629-0331
(302) 629-8787 (FAX)

SPILL/SLUG RESPONSE PROCEDURES

SPILL /SLUG RESPONSE PROCEDURES

WARNING

Always approach spills from upwind side whenever possible.

Avoid direct physical contact with spilled chemicals.

Contact the On-Scene Coordinator or Assistant.

Take Action Only Under His Direction.

ON-SCENE COORDINATOR Doug Andrew

ASSISTANT Nate Hedges

- I. The On-Scene Coordinator (or assistant) will contact Blades or Seaford Fire Department and supply the following information:
 - a. Location of spill/slug.
 - b. Chemical or substance spilled/slug discharge.
 - c. Estimated quantity (in gallons).
 - Greater than 25 gallons Report to: National Response Center & DE DNREC.
 - Less than 25 gallons Alert: National Response Center & DE DNREC.
 - Extremely Hazardous
 - II. Close Off Area:
 - a. Limit personnel entering or leaving area.
 - b. Wear necessary protective equipment.
 - c. Determine if spill/slug is a threat to human life/environmental impact. Check MSDS.
 - III. Containment:
 - a. Shut off flow at the source if it can be done WITHOUT UNDUE RISK by shutting off valve, plugging hole or rotating container to prevent run off.
 - b. Contain material flow by pumping, sandbagging, using absorbent pads or materials (spills less than 20 gallons), construction beams, dams, or ditches, diverting, plugging or containerizing. Remember, the object is to keep the material from entering the soil or water.
-
- IV. Spill/Slug Cleanup. Method of cleanup will be determined by the On-Scene Coordinator.
- Some of the methods are:
- a. Neutralize the pollutant in place.
 - b. Absorbing or emulsifying the pollutant with another material.
 - c. Returning the pollutant to a container.
 - d. Allowing the pollutant to evaporate to the atmosphere. (Use with discretion).

PROCINO PLATING, INC.
901 S. MARKET STREET
BLADES, DE 19973
(302) 629-0331
(302) 629-8787

WRITTEN HAZARD
COMMUNICATION PROGRAM

Note: OSHA'S Hazard Communication Standard requires an employer to develop a written hazard communication program. The following is Procino Plating, Inc.'s program. It is not intended to supersede the requirements of the standard. OSHA'S #1910.1200 "You Have The Right to Know".

GENERAL COMPANY POLICY

To ensure that information about the dangers of all hazardous chemicals used by Procino Plating, Inc. are known by all employees, this hazard communication program has been established. All work units will participate in the program and a copy of it will be available in the front office for review by any interested party.

CONTAINER LABELING

The hazardous material Coordinator will verify that all containers received for use will be clearly labeled as to their contents, have an appropriate hazard warning, and list the name and address of the manufacturer or distributor.

The HazMat Coordinator in each section will ensure that all secondary containers are labeled with either a copy of the original manufacturer's label or with labels that have the identity of the contents and appropriate hazard warning. For assistance, see the hazMat Coordinator or your supervisor.

On the following individual stationary process containers, we are using labels with ratings to convey the required information.

HMIG Hazardous Material Information Guide

See attachment

HazMat Coordinators are:




Principal Patrick Procino

Alternate Douglas Andrew

Alternate Nathan Hedges

Hydrochloric Acid

(CHECK OFF APPROPRIATE BOXES)	
ROUTE OF ENTRY	
<input checked="" type="checkbox"/> INHALATION	<input checked="" type="checkbox"/> INGESTION
<input type="checkbox"/> SKIN ABSORPTION	<input checked="" type="checkbox"/> SKIN OR EYE CONTACT
HEALTH HAZARDS	
<input type="checkbox"/> NO HEALTH HAZARD	<input checked="" type="checkbox"/> IRRITANT
<input type="checkbox"/> TOXIC	<input checked="" type="checkbox"/> CORROSIVE
<input type="checkbox"/> HIGHLY TOXIC	<input type="checkbox"/> SENSITIZER
<input type="checkbox"/> REPRODUCTIVE TOXIN	<input type="checkbox"/> CARCINOGEN
PHYSICAL HAZARDS	
<input type="checkbox"/> NO PHYSICAL HAZARDS	
<input type="checkbox"/> COMBUSTIBLE LIQUID	
<input type="checkbox"/> COMPRESSED GAS	
<input checked="" type="checkbox"/> OXIDIZER	
<input type="checkbox"/> FLAMMABLE GAS	
<input type="checkbox"/> EXPLOSIVE	
<input type="checkbox"/> FLAMMABLE LIQUID/SOLID	
<input type="checkbox"/> PYROPHORIC	
<input type="checkbox"/> ORGANIC PEROXIDE	
<input type="checkbox"/> WATER REACTIVE	
<input type="checkbox"/> UNSTABLE (REACTIVE)	
TARGET ORGANS & EFFECTS	
<input checked="" type="checkbox"/> LUNGS	
<input type="checkbox"/> HEART	
<input type="checkbox"/> KIDNEY	
<input type="checkbox"/> EYES	
<input checked="" type="checkbox"/> SKIN	
<input type="checkbox"/> PROSTATE	
<input type="checkbox"/> BLOOD	
<input type="checkbox"/> LIVER	
<input type="checkbox"/> CENTRAL NERVOUS SYSTEM	
<input type="checkbox"/> CARDIOVASCULAR SYSTEM	
<input type="checkbox"/> MUCOUS MEMBRANES	
<input type="checkbox"/> AUTONOMIC NERVOUS SYSTEM	
<input checked="" type="checkbox"/> RESPIRATORY SYSTEM	
<input type="checkbox"/> BLOOD	
<input type="checkbox"/> MUTAGEN	
<input type="checkbox"/> TERATOGEN	

	HEALTH
	FLAMMABILITY
1	REACTIVITY
	PROTECTIVE EQUIPMENT

Consult MSDS for further hazard information and instructions.

BRADY® SIGNMARK® DIV. CATALOG NO. 60336



MATERIAL SAFETY DATA SHEETS

The HazMat coordinator is responsible for establishing and monitoring the company's MSDS program. He/she will ensure that procedures are developed to obtain the necessary MSDS's and will review incoming MSDS's for new or significant health and safety information. Affected employees will be informed of any new information. The following procedure will be followed when an MSDS is not received at the time of initial shipment: It is the responsibility of the HazMat coordinator to notify the appropriate company of the missing MSDS and to ask that it be faxed to our company as soon as possible with the originals to follow by mail. Copies of all MSDS's for all hazardous chemicals in use will be kept in the front office.

MSDS's will be readily available to all employees during each work shift. If an MSDS is not available, immediately contact your supervisor. To ensure that MSDS are readily available for access, the following format will be used: The HazMat Coordinator is responsible for ensuring that the MSDS's are in a prominent location to which every employee has access. MSDS's books are located at the time clock location.

When revised MSDS's are received, the following procedures will be followed to replace obsolete MSDS's: The HazMat Coordinator must maintain a current list of all MSDS's and when the MSDS's are updated it is the HazMat Coordinator's responsibility to see that the obsolete MSDS is removed and the updated MSDS is put in its place.

EMPLOYEE TRAINING AND INFORMATION

The supervisor is responsible for the company's employee MSDS training program. He/she will ensure that all program elements specified below are implemented.

Each new employee will attend a health and safety orientation that includes:

- A. An overview of the requirements of OSHA's Hazard Communication Standard. PURPOSE: The purpose of this section is to ensure that the hazards of all chemicals used are evaluated, and that information concerning their hazards is transmitted to employers and employees. This transmittal of information is to be accomplished by means of comprehensive hazard communication programs, which are to include container labeling, and other forms of warning, material safety data sheets and employee training.
- B. Hazardous chemicals present at his/her workplace.
- C. Physical and health risks of the hazardous chemicals.
- D. The symptoms of overexposure.

E. How to determine the presence or release of hazardous chemical in his/her Work area:

1. Would be visual evidence of uncontained liquid on the floor.
2. Visual gas present that can not be explained.
3. Unusual odor present that can not be explained.

F. How to reduce or prevent exposure to hazardous chemical through the use of control procedures, work practices and personal protective equipment. Don't leave a hose running in a tank, by pouring chemicals slowly, and not splashing parts into process tanks. PPE by having glasses, boots, and apron on.

G. Steps the company has taken to reduce or prevent exposure to hazardous chemicals.

1. The steps taken are Ventilation Process tanks, making sure of PPE for employees.

H. Procedures to follow if employees are overexposed to hazardous chemicals.

1. Notify first aid respondents or supervisor.
2. Obtain MSDS to see what 1st aid response is recommended for occurrence.
3. Have supervisor call 911 if serious enough, if supervisor is unavailable the employee should call.

I. How to read labels and review MSDS to obtain hazard information.

J. Location of the MSDS file and the company's written hazard communication Program.

1. The MSDS books are located in the Time Clock area.

Prior to introducing a new chemical hazard into any section, each employee in the section will be given information and training as described above for the new chemical hazard. The training format will be as follows: The HazMat Coordinator or your supervisor will call a meeting. This meeting will be used to define the new material to all employees and to explain all precautions that must be taken when using the new material. A question and answer period will be part of the meeting.

PROGRAM AVAILABILITY

The HazMat Coordinator has the responsibility to make this program available for review upon request. In addition, a copy of the program will be provided within (1) day from the date of the request. The request must be made in writing.

HAZARDOUS NON-ROUTINE TASKS

Periodically, employees are required to perform hazardous non-routine tasks. Some examples of these are:

1. Cleaning of the plating tanks.
2. Transferring chemical to different areas of the building.
3. Helping load or unload chemicals due to shipment.

Prior to starting work on such projects, each affected employee will be given verbal information by the HazMat Coordinator or his/her supervisor about the hazardous chemical that may be encountered. This information will include specific chemical hazards, protective and safety measures to follow, and steps the company is using to reduce hazards.